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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**ADMINISTRATIVE MOTION TO FILE
TEMPORARILY UNDER SEAL
PLAINTIFFS' SUBMISSION REGARDING
DISPUTED SEARCH TERMS**

Judges: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
VIA VIDEO CONFERENCE

Pursuant to Civil Local Rules 79-5 and 7-11, the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), Discovery Order No. 7 (Dkt. No. 522), and the parties' Stipulation and [Proposed] Order Regarding Search String Briefing (Dkt. No. 542), the Consolidated Plaintiffs ("Plaintiffs") hereby submit this Administrative Motion to Temporarily File Under Seal. Specifically, Plaintiffs move for leave to temporarily file under seal the Plaintiffs' Submission Regarding Disputed Search Strings and Exhibits A to O thereto ("Plaintiffs' Submission").

Plaintiffs move for leave to temporarily file Plaintiffs' Submission under seal in its entirety because the Submission contains or references materials designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order entered in this action. *See* Declaration of Lesley E. Weaver ("Weaver Decl.") ¶ 3.

As agreed to by the parties in their Stipulation and [Proposed] Order Regarding Search Term Briefing (Dkt. No. 542), on or before October 23, 2020, Facebook, as the Designating Party, will file a motion to permanently seal any portions of Plaintiffs' Submission it determines should remain under seal, or be redacted.

In light of the foregoing, Plaintiffs respectfully request that the Court grant their Administrative Motion to File Under Seal.

Dated: October 16, 2020

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/ Lesley E. Weaver
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 16th day of October, 2020, at Oakland, California.

Lesley E. Weaver

Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on October 16, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system. I also caused a copy of the under seal filing to be manually served via email in accordance with Civil L.R. 5-1(h).

Executed this 16th day of October, 2020, at Oakland, California.

Lesley E. Weaver
Lesley E. Weaver